

arguments are not addressed in the current Office Action, which focuses rather on the claim amendments made in the April 27 Amendment.

With respect to those amendments, the Office Action concedes that Foster does not teach the features added to the independent claims by Applicants' April 27 Amendment regarding encrypting each process description using the information of each one of job processor which executes the process. The Office Action also concedes that Foster fails to teach the features of claims 6 and 8 regarding deleting a part of the decrypted process description from the instruction data. The Office Action relies on Sutton to remedy these shortfalls. The analysis of the Office Action fails for at least the following reasons.

As previously argued, the Office Action continues to maintain an unreasonable interpretation regarding what paragraph [0056] of Foster can be considered to suggest with regard to the claimed transmitter, or sending step, positively recited in independent claims 1, 7 and 10. Paragraph [0056] of Foster refers to a work flow controller being used to create job tickets that are stored in a job ticket service. The work flow controller sends the created job ticket to the job ticket service for storage and processing. This work flow controller cannot reasonably be considered to correspond to a transmitter, or sending step, which sends instruction data to the job processor which executes the process described in the encrypted process description, as varying recited in claims 1, 7 and 10, despite the assertions to the contrary in the Office Action.

Further, the asserted combination of Foster and Sutton is unreasonable. Sutton deals with computer architecture comprising a controller on one computer to manage multiple other computers, each of the other computers containing agent software allowing the multiple other computers to be managed by the controller. The systems of Sutton can be used, for example, to run data centers containing hundreds to many thousands of computers performing a variety of roles for a variety of purposes. Sutton mentions, at col. 11, line 38-col. 12, line 27, in the

context of automatically configuring new machines within the control network, that, in order to maintain control of a node by a trusted controller, and to prevent a rogue controller or computer from obtaining sensitive information, sensitive information may be encrypted such that only target nodes of a secured message can decrypt it. This broad disclosure in Sutton regarding "sensitive information" cannot reasonably be considered to have suggested the specific features of the encryption processor recited, for example, in claim 1, which encrypts each process description defined in instruction data using information of each one of job processor which executes the process, so that the process description is decryptable for the job processor. In other words, it is unreasonable to conclude that Sutton specifically addresses each of any corresponding process descriptions defined in a corresponding instruction data as claimed.

Moreover, it is unclear how the Office Action actually proposes that the teaching of Foster be modified by any teaching of Sutton. For example, the Office Action first asserts that Foster discloses an encryption of the job tickets 61. Modifying the encryption in Foster would not arrive at the subject matter of the pending claims at least because the encryption in Foster appears to be directed only to restricting access to the job tickets that are stored in the common location on the network. This cannot reasonably be considered to correspond to any encryption with respect to the communication of particular job instructions to processors responsible for individual jobs. It is unclear from the Office Action why or how one of ordinary skill in the art would not have been motivated to modify Foster with the teaching of Sutton. Any such modification would likely render Foster unsuitable for its intended purpose and/or impermissibly alter its method of operation. For example, the type of exact coordination and control disclosed between the controller and the nodes in Sutton does not complement the open architecture of Foster, which allows multiple users to access job tickets

stored and managed by a service center that, in turn, can use a variety of, for example E-commerce services to provide a requested service.

As stated in paragraph [0042] of Foster, the service center 40 allows a broad spectrum of communications between entities coupled to the service center 40. In particular, the service center 40 allows different e-services to interact programmatically with one another using specific protocols and generic protocols. This programmatic interaction allows different services and processes that are coupled to the network to exchange data and files, and to modify the data and files. Such methods and protocols are not apparently intended to be limited in similar manner as the network structure of Sutton, which relies on singly authenticated, controllers for the nodes.

Regarding claim 2, the combination of Foster and Sutton cannot reasonably be considered to have suggested an encryption processor encrypting a process description, which is a current encryption target together with encrypted data on the process description about a downstream process to be carried out later than the process described in the process description of the current encryption target. Neither of the applied references deals with a process description, which is a current encryption target, together with a process description about a corresponding downstream process.

Regarding claims 6 and 8, the Office Action asserts that, because (1) Sutton discloses an administration program 210 that allows creation or editing of a script, including deletion of a script entry, and (2) Foster discloses an expiration date/time segment that may be used to terminate active status of a ticket, and subsequent deletion of the ticket may help to eliminate stale data and free up resources for other job requests, these teachings would have led one of ordinary skill in the art to arrive at the features of these claims. For example, it is asserted that these teachings of the references would have somehow suggested decrypting a part of a received process description for a job processor, deleting a part of the decrypted process

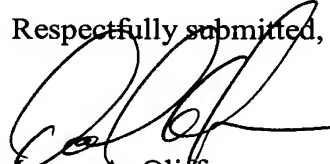
description from the instruction data, and sending the instruction data from which the decrypted process description has been deleted to another job processor which subsequently executes further processing. This assertion is not supportable based on the teachings of these references at least because the full extent of this combination of features is not suggested by the references, nor does the suggestion of deleting stale tickets in Foster provide motivation to combine the script editing function in Sutton to arguably arrive at the subject matter of the pending claims.

In summary, the Office Action fails to establish a *prima facie* case for obviousness of at least the subject matter of claims 1, 2, 6-8 and 10 over the applied references. Further, claims 3-5, 9 and 11 also would not have been suggested by the applied references for at least the respective dependence of these claims on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

In view of the foregoing, Applicants respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-11 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned at the telephone number set forth below.

Respectfully submitted,



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